



*United States Attorney
Southern District of New York*

*Jacob K. Javits Federal Building
26 Federal Plaza, 38th Floor
New York, New York 10278*

May 30, 2024

VIA ECF

Honorable Paul G. Gardephe
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

**Re: *United States v. Lawrence Billimek,*
22 Cr. 675 (PGG)**

Dear Judge Gardephe:

The Government respectfully submits the enclosed Stipulation and Order for the Court's review and approval.

As set forth in the Consent Preliminary Order of Forfeiture as to Specific/Property/Money Judgment entered on November 28, 2023 (Docket Entry 52), the Court imposed a forfeiture money judgment in the amount of \$12,249,000.00 in United States currency (the "Money Judgment") and forfeited all right, title and interest of the Defendant in, *inter alia*, the real property located at 147 Magnolia Drive, San Antonio, Texas (the "Subject Property").

As outlined in the proposed Stipulation and Order, in lieu of seeking a Final Order of Forfeiture for the Subject Property, the Government has agreed to accept a payment in the amount of \$550,000 in United States currency which will be applied towards the Money Judgment.

Accordingly, the Government respectfully requests the Court enter Stipulation and Order.

Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By:

Jason A. Richman
Assistant United States Attorney
Tel. No.: (212) 637-2589

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	
	:	<u>STIPULATION AND ORDER</u>
- v. -	:	22 Cr. 675 (PGG)
LAWRENCE BILLIMEK,	:	
	:	
Defendants.	:	
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WHEREAS, on or about November 28, 2023, the Court entered a Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment, imposing a forfeiture money judgment in the amount of \$12,249,000.00 in United States currency (the “Money Judgment”) and forfeiting all right, title and interest of the Defendant in, *inter alia*, the real property located at 147 Magnolia Drive, San Antonio, Texas (the “Subject Property”);

WHEREAS, in lieu of obtaining a final order of forfeiture forfeiting all right, title and interest in the Subject Property, the Government has agreed to accept the sum of \$550,000 in United States currency from Lance and Leslie Beckett (the “Becketts”) representing the agreed upon fair market value of the Subject Property;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Damian Williams, United States Attorney, Assistance United States Attorney Jason A. Richman, of counsel, and the Becketts, pro se, that:

1. Upon entry of this Stipulation and Order, the Becketts shall make a payment to the Government in the amount of \$550,000 in United States currency (the “Payment”) which shall be made by bank or certified check payable to the United States Marshals Service and delivered by mail to the United States Attorney’s Office, Southern District of New York, Attn:

Money Laundering and Transnational Criminal Enterprises Unit, One St. Andrew's Plaza, New York, New York 10007 and shall indicate the Defendant's name and case number.

2. Upon receipt, the Government shall apply the Payment towards the satisfaction of the Money Judgment.

3. The Government disclaims any interest in the Subject Property and shall not seek any further forfeiture of the Subject Property.

4. The Government agrees to cancel any lis pendens it has filed on the Subject Property.

5. The Government agrees to execute promptly any documents which may be required to convey clear title of the Subject Property.

6. This Stipulation and Order constitutes the entire agreement between the Government and the Becketts (the "Parties") on the matters raised herein, and no other statement, promise or agreement, either written or oral, made by any party or agents of any party that is not contained in this Stipulation and Order shall be enforceable.

7. Each party agrees to bear their own costs and attorneys fees.

8. The Parties hereby waive all rights to challenge or contest the validity of this Stipulation and Order.

9. The Court shall have exclusive jurisdiction over the interpretation and enforcement of this Stipulation and Order.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

10. The signature page of this Stipulation and Order may be executed in one or more counterparts, each of which will be deemed an original, but all of which together will constitute one and same instrument.

AGREED AND CONSENTED TO:

DAMIAN WILLIAMS
United States Attorney
Southern District of New York
United States of America

By: J-A. Richman
Jason A. Richman
Assistant United States Attorney
One Saint Andrews Plaza
New York, New York 10007
(212) 637-2589

05/29/2024

Date

LANCE BECKETT

By: Lance Beckett
Lance Beckett

05/24/2024

Date

LESLIE BECKETT

By: Leslie Beckett
Leslie Beckett

05/24/2024

Date

SO ORDERED:

Paul G. Gardephe
HONORABLE PAUL G. GARDEPHE
UNITED STATES DISTRICT JUDGE

June 3, 2024

DATE